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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	:
	:
<b>LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i>,</b>	:
	:
<b>Debtors.</b>	:
	:
	:
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**NOTICE OF FILING OF SETTLEMENT AGREEMENTS  
AND REVISED PROPOSED ORDER RELATING TO DEBTORS'  
MOTION PURSUANT TO SECTION 363 OF THE BANKRUPTCY  
CODE AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019 FOR  
AUTHORITY TO ENTER INTO SETTLEMENT WITH BOND SAFEGUARD  
INSURANCE COMPANY AND LEXON INSURANCE COMPANY**

PLEASE TAKE NOTICE that in connection with the hearing to be held on  
October 19, 2011 at 10:00 a.m. with respect to the motion of Lehman Brothers Holdings Inc. and  
its affiliated debtors in the above referenced chapter 11 cases, including Lehman Commercial  
Paper Inc., as debtors-in-possession (together, the "Debtors"), pursuant to section 363 of title 11  
of the United States Code and Rule 9019 of the Federal Rules of Bankruptcy Procedure for  
authority to enter into a settlement with Bond Safeguard Insurance Company and its affiliate

Lexon Insurance Company (the “Motion”)<sup>1</sup> [ECF No. 20355], the Debtors hereby file a copy of the Bond Settlement Agreements and a revised form of order.

PLEASE TAKE FURTHER NOTICE that in accordance with the material terms, provisions and conditions of the Bond Safeguard Term Sheet, attached to the Motion as Exhibit A, the Lehman Creditors, as applicable, and Bond Safeguard with respect to the SunCal Involuntary Debtors have entered into that certain settlement agreement attached hereto as Exhibit 1. The Lehman Creditors, as applicable, and Bond Safeguard with respect to the SunCal Voluntary Debtors have entered into that certain settlement agreement in accordance with the material terms, provisions and conditions of the Bond Safeguard Term Sheet and attached hereto as Exhibit 2.

PLEASE TAKE FURTHER NOTICE that in light of the executed Bond Settlement Agreements, the Debtors hereby file a revised form of order approving the Motion. Attached hereto as Exhibit 3 is a clean copy of the revised form of order granting the Motion. Attached hereto as Exhibit 4 is a blacklined copy of the revised form of order granting the Motion, marked to reflect modifications made to the proposed order annexed to the Motion.

Dated: October 14, 2011  
Houston, Texas

/s/ Alfredo R. Pérez  
Alfredo R. Pérez

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.